

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ContentGuard Holdings, Inc.,

Plaintiff,

v.

Amazon.com, Inc.; Apple Inc.; BlackBerry Limited (fka Research In Motion Limited) and BlackBerry Corporation (fka Research In Motion Corporation); HTC Corporation and HTC America, Inc.; Huawei Technologies Co., Ltd. and Huawei Device USA, Inc.; Motorola Mobility LLC; Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC,

Defendants.

Civil Action No. 2:13-cv-01112-JRG

JURY TRIAL DEMANDED

NOTICE OF COMPLIANCE

Pursuant to Paragraph 12 of the Amended Protective Order Regarding the Disclosure and Use of Discovery Materials (Dkt. No. 152), notice is given that Plaintiff ContentGuard Holdings, Inc. produced third-party confidential information in compliance with the Amended Protective Order and verifies as follows:

1. **Adobe:** ContentGuard notified Adobe of its intent to produce information by letter dated December 1, 2014, sent by overnight mail. ContentGuard has not received a response. ContentGuard is producing the information as confidential - attorneys' eyes only.
2. **DISH Network:** ContentGuard notified DISH of its intent to produce information by letter dated December 1, 2014, sent by overnight mail.

ContentGuard has not received a response. ContentGuard is producing the information as confidential - attorneys' eyes only.

3. **LG:** ContentGuard notified LG of its intent to produce information by letter dated November 26, 2014, sent by email and overnight delivery. LG responded via email, requesting redaction and omission of certain information about patents that are neither in suit, nor in the same chain of priority as the patents in suit, nor foreign counterparts. In a later email exchange, LG also requested further information. ContentGuard made the requested redactions and omissions and resubmitted the documents to LG along with the other requested information. On Tuesday, December 16, LG notified ContentGuard that it has no objection to production of the redacted documents. ContentGuard is producing the documents with the requested redactions as confidential- attorneys' eyes only.
4. **NEC:** ContentGuard notified NEC of its intent to produce information by letter dated November 26, 2014, sent by email and overnight delivery. NEC responded by email on December 9, 2014, requesting further information. After a further exchange, NEC notified ContentGuard by email that it did not object to the production of the information as confidential - attorneys' eyes only.
5. **NEC Casio:** ContentGuard notified NEC Casio, successor to Casio Hitachi, of its intent to produce information by letter dated November 26, 2014, sent by overnight mail. ContentGuard has not received a response to the letter.

ContentGuard is producing the information as confidential - attorneys' eyes only.
6. **Nokia:** ContentGuard notified Nokia of its intent to produce information by letter dated November 26, 2014, sent by email to counsel and by overnight delivery to

the company. After further exchanges, Nokia notified ContentGuard that it would not be filing an objection by email on December 15. ContentGuard is producing the information as confidential - attorneys' eyes only.

7. **Panasonic:** ContentGuard notified Panasonic of its intent to produce information by letter dated November 26, 2014, sent by overnight mail. ContentGuard has not received a response. ContentGuard is producing the information as confidential - attorneys' eyes only.
8. **Toshiba:** ContentGuard notified Toshiba of its intent to produce information by letter dated November 26, 2014, sent by overnight mail. ContentGuard has not received a response. ContentGuard is producing the information as confidential - attorneys' eyes only.
9. **Vodafone:** ContentGuard notified Vodafone of its intent to produce information by letter dated December 1, 2014, sent by overnight mail. ContentGuard has not received a response. ContentGuard is producing the information as confidential - attorneys' eyes only.
10. **Zinio:** ContentGuard notified Zinio of its intent to produce information by email to counsel on November 26, 2014. Zinio responded via email on December 18 that it would not be objecting to the production of specified information. ContentGuard is producing that specified information as confidential - attorneys' eyes only.

Dated: December 19, 2014

Respectfully submitted,

/s/ Sam Baxter

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Counsel for ContentGuard Holdings, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic services on December 19, 2014. Local Rule CV-5(a)(3)(A).

/s/ Holly Engelmann